

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Case No.: 1:23-cv-00423-WO-JLW

CHAPLIN, et al.

Plaintiffs,

V.

ROWE, et al.

Defendants.

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**JUDICIAL DEFENDANTS’
CONSENT MOTION TO
EXPAND WORD LIMIT FOR
THEIR MEMORANDUM OF
LAW IN SUPPORT OF THEIR
MOTION TO DISMISS**

NOW COME Defendants Ryan Boyce, Brad Fowler, Blair Williams, Susie K. Thomas, and Elisa Chinn-Gary (Judicial Defendants), with the consent of Plaintiffs, to move the Court to increase the word limit for their memorandum of law in support of their motion to dismiss. In support of this motion, the Judicial Defendants submit the following:

1. On February 27, 2024, the Honorable District Judge William L. Osteen, Jr., held a status conference, wherein the Court allowed Plaintiffs leave to file a Second Amended Complaint, adding new plaintiffs, defendants and claims. [February 27, 2024 Minute Entry]

2. The Court set a briefing schedule, directing defendants to file motions to dismiss by April 9, 2024. [Id.]

3. The Second Amended Complaint names thirteen plaintiffs and eleven defendants, comprises fifty pages, contains 336 paragraphs, and seven causes of action. [DE 77]

4. In light of the number of named Plaintiffs, each with unique factual allegations, the new claims and new defendants, the Judicial Defendants reasonably believe that will require an increase in the word limit set forth in Local Civil Rule 7.3(d)(1) to fully address each plaintiff's factual allegations as applied to each defendant, the causes of action and any applicable defenses for each of the five Judicial Defendants.

5. Accordingly, the Judicial Defendants respectfully move that for their memorandum of law filed in support of their motion to dismiss, they shall have up to and including 10,000 words.

6. This motion is made in good faith and not for the purposes of delay.

7. Counsel for Plaintiffs were consulted and consent to the word limit expansion proposed above.

WHEREFORE, for the reasons set forth above and for good cause shown, the Judicial Defendants request that the Court order that the word limit for their memoranda of law in support of a motion to dismiss shall not exceed 10,000 words.

Respectfully submitted, this the 1st day of April, 2024.

JOSHUA H. STEIN
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/s/Elizabeth Curran O'Brien
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Williams, Thomas and Chinn-Gary*

CERTIFICATE OF SERVICE

This is to certify that I electronically filed the foregoing **CONSENT MOTION TO EXPAND WORD LIMIT FOR JUDICIAL DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION TO DISMISS** using the CM/ECF system, which will send notification of such filing to all registered CM/ECF users.

This the 1st day of April, 2024.

/s/ Elizabeth Curran O'Brien
Elizabeth Curran O'Brien
Special Deputy Attorney General